



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

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OFFICE OF  
WATER AND  
WATERSHEDS

Ms. Wendy Wiles, Director  
Environmental Solutions  
Oregon Department of Environmental Quality  
811 S.W. Sixth Avenue  
Portland, Oregon 97204-1390

RE: Comments on the Nonpoint Source Management Program Update

Dear Ms. Wiles:

On September 30, 2014, US Environmental Protection Agency (EPA) received the submission of the final Oregon Nonpoint Source Management (NPS) Program Plan (Plan) for review. We appreciate your submitting the Plan on time along with all comments you received from the public. This will help us meet our deadlines to have an approvable NPS plan under the Clean Water Act Section 319(h)(8). EPA reviewed the NPS plans using the guidance, "Key Components of an Effective State Nonpoint Source Management Program (pages 53-59 that is also on EPA's website at <http://water.epa.gov/polwaste/nps/upload/319-guidelines-fy14.pdf>).

We have attached two sets of comments to help you facilitate revisions to the document. The first addresses each individual component outlined in the guidance referenced above. The second attachment are comments that were sent originally on the draft NPS plan but were probably not opened or seen by staff. In general the comments address the need for more prioritization of watersheds and descriptions of how this will be accomplished. The plan needs to provide more information on causes of NPS pollution, monitoring, Best Management Practices (BMP's), measures of progress, and a schedule for meeting goals. The document will need overall editing and renumbering as well.

My staff is also available to respond to any questions regarding these comments. Overall we are confident that with recommended revisions that the plan can be completed early in 2015. We look forward to reviewing the next version of the plan. If you have any question, please contact Martha Turvey (206) 553-1354 or Jayne Carlin (206) 553-8512 of my staff.

Sincerely,

David Croxton, Manager  
Watershed Unit  
Office of Water and Watersheds